

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

GCT 5 1994

94-LWB-059

Mr. David C. Nylander, Section Manager Off Site/Cross Site Nuclear Waste Program State of Washington Department of Ecology P.O. Box 1386, MSIN N1-05 Richland, Washington 99352

Dear Sir:

RESPONSE TO ECOLOGY COMMENTS ON THE MISCELLANEOUS STREAMS PLAN AND SCHEDULE (DOE/RL-93-94, REV 0)

This letter responds to comments received from the State of Washington Department of Ecology (Ecology) on the "Plan and Schedule for Disposition and Regulatory Compliance for Miscellaneous Streams" (DOE/RL-93-94, Rev 0) (Plan and Schedule). The Plan and Schedule was submitted to Ecology on January 30, 1994, to fulfill a milestone of Consent Order No. DE 91NM-177. Ecology comments were issued on May 18, 1994.

In response to the first two major points listed in the Ecology May 18, 1994 letter, the U. S. Department of Energy, Richland Operations Office (RL) is in agreement with Ecology, and will not continue to pursue a general permit under Washington Administrative Code (WAC) 173-226, and will remove the de minimis criteria from the Plan and Schedule document. The third major comment was addressed in a kickoff meeting on June 16, 1994, where RL and Ecology began discussions on which of the qualitative streams will be included in WAC 173-216 permitting. These negotiations are continuing now. In subsequent meetings, there will be discussions regarding the date for rerouting, or eliminating, those streams which are potentially contaminated, or discharged to a surface contaminated area. RL is further assessing the timetable and feasibility of completing the rerouting or elimination of these streams. RL is committed to the elimination or rerouting of the streams as soon as practicable.

The other issues detailed in the attachment containing the specific comments on the Plan and Schedule document are being addressed in meetings with Melodie Selby of Ecology. Once all the issues are resolved, a revised Plan and Schedule document will be submitted to Ecology. Because a consensus will be reached on the content of revised Plan and Schedule before submittal to Ecology, it is anticipated that Ecology approval will be expedited.

Mr. David C. Nylander 94-LWB-059

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Should you have any questions or comments, please contact Mr. M. J. Furman of my staff on $(509)\ 376-7062$.

Sincerely,

J. M. Hennig, Director Waste Programs Division

WPD:MJF

cc: A. J. Diliberto, WHC

J. J. Luke, WHC M. A. Selby, Ecology

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J. M. Hennig, RL (S. J. Skurla, WHC) D. C. Nylander, Ecology

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